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12 *Counsel for Debtor*

13 **UNITED STATES BANKRUPTCY COURT**

14 **DISTRICT OF NEVADA**

15 In re

16 CASH CLOUD, INC.,  
17 dba COIN CLOUD

18 Debtor.

19 Case No. BK-23-10423-MKN

20 Chapter 11

21 **DECLARATION OF DANIEL AYALA IN  
22 SUPPORT OF DEBTOR'S OMNIBUS  
23 OBJECTION TO LATE FILED AND NON-  
24 COMPLIANT ADMINISTRATIVE EXPENSE  
25 CLAIMS**

26 Hearing Date: October 19, 2023

27 Hearing Time: 10:30 a.m.

28 I, Daniel Ayala, declare as follows:

1. I am the Independent Director of Cash Cloud, Inc., dba Coin Cloud, the debtor and  
2. debtor-in-possession (the “Debtor”).

3. Except as otherwise indicated herein, this Declaration is based upon my personal  
knowledge. I am over the age of 18 and am mentally competent. If called upon to testify, I would  
testify competently to the facts set forth in this Declaration. I make this Declaration in support of  
the objection captioned above (“Objection”).<sup>1</sup>

4. Debtor objects to the Late Filed Claims because they were filed after the Bar Date,  
5. and in many cases, were not sent to or filed with the Bankruptcy Court as required by the Bar Date  
6. Order.

7. <sup>1</sup> Unless otherwise defined herein, all capitalized terms have the meanings ascribed them in the Objection.

1           4. Debtor has determined that each of the Late Filed Claims set forth on Exhibit 1 to the  
2 Objection was filed after the Bar Date and, in many instances, such Late Filed Claims were also  
3 sent to Debtor's counsel rather than properly sent to or filed with the Bankruptcy Court. Debtor has  
4 also determined that each holder of a Late Filed Claim had proper notice of the Bar Date. The  
5 names of the holders of each of the Late Filed Claims were compared to the list of parties who  
6 received the Bar Date Notice as indicated on the Certificates of Service. All parties were each listed  
7 on the Certificates of Service as set forth in more detail on Exhibit 1 to the Objection, at their last  
8 known address or email address on file with Debtors.

9       5.     None of the parties who filed the Late Filed Claims have either filed a motion under  
10 Rule 3002(c)(6) contending that the notice of the Bar Date they received was insufficient, or filed a  
11 motion under Rule 9006(c)(1) contending that their failure to time file such Late Filed Claims was a  
12 result of excusable neglect.

I declare, under penalty of perjury of the laws of the United States of America, that the foregoing statements are true and correct to the best of my knowledge, information and belief.

15 Executed this 20th day of September, 2023 in Las Vegas, Nevada.

/s/ Daniel Ayala

DANIEL AYALA

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